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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

**IN RE TRIDENT MICROSYSTEMS, INC.
DERIVATIVE LITIGATION**

Case No.: C 06-3440-JF

STIPULATION AND {PROPOSED}
ORDER SETTING BRIEFING
SCHEDULE FOR DEFENDANT
FRANK LIN'S MOTION TO DISMISS
PLAINTIFFS' SECOND AMENDED
CONSOLIDATED VERIFIED
SHAREHOLDER COMPLAINT AND
SETTING DATE FOR RESPONSE OF
DEFENDANT TRIDENT
MICROSYSTEMS, INC. TO PLAINTIFFS'
SECOND AMENDED COMPLAINT AND
DEFENDANT LIN'S COUNTERCLAIM

This Document Relates to:

ALL ACTIONS

1 WHEREAS, on May 28, 2010, during a status conference in this matter, the Court
2 set a hearing for October 29, 2010 at 9:00 a.m. for defendant Frank Lin's anticipated motion to
3 dismiss plaintiffs' amended complaint;

4 WHEREAS, on July 1, 2010, plaintiffs filed a Second Amended Consolidated
5 Verified Shareholder Complaint ("SAC");

6 WHEREAS, plaintiffs and Mr. Lin, through their counsel have conferred and
7 agreed to a briefing schedule concerning Mr. Lin's motion to dismiss the SAC;

8 WHEREAS, Mr. Lin and nominal defendant Trident Microsystems, Inc.
9 ("Trident"), through their counsel and in light of ongoing mediation with the Honorable Justice
10 Howard B. Weiner (ret.), have conferred and agreed to a response date to the counterclaim filed by
11 Mr. Lin against Trident;

12 THEREFORE, IT IS STIPULATED AND AGREED AS FOLLOWS:

13 1. Mr. Lin shall file his motion to dismiss the SAC on or before September 1,
14 2010;

15 2. Plaintiffs shall file their brief in opposition to Mr. Lin's motion to dismiss
16 on or before October 1, 2010;

17 3. Mr. Lin shall file his reply brief in support of his motion to dismiss on or
18 before October 22, 2010; and

19 4. The hearing for Mr. Lin's motion to dismiss the SAC shall be on
20 November 5, 2010 at 9:00 a.m.

21 5. Any responsive pleading by Trident to the SAC shall be filed on or before
22 September 1, 2010. If such pleading is filed, and it is a motion brought under Rule 12 of the
23 Federal Rules of Civil Procedure, such motion shall be briefed and heard on the same schedule as
24 set forth above for Mr. Lin's motion.

25 6. Any responsive pleading by Trident to the counterclaim of Mr. Lin shall be
26 filed on or before September 1, 2010. If such pleading is filed, and it is a motion brought under
27 Rule 12 of the Federal Rules of Civil Procedure, such motion shall be briefed and heard on the
28 //

1 same schedule as set forth above for Mr. Lin's motion.

2
3 Dated: August 18, 2010

SHEARMAN & STERLING LLP

4
5 By: _____ /s/
Mikael A. Abye

6 Attorneys for Defendant Frank C. Lin

7 Dated: August 18, 2010

8 DLA PIPER LLP (US)

9 By: _____ /s/
10 Nate McKitterick

11 Attorneys for Nominal Defendant Trident
12 Microsystems, Inc.

13 Dated: August 18, 2010

14 ROBBINS GELLER RUDMAN & DOWD LLP

15 By: _____ /s/
16 Christopher M. Wood

17 BARROWAY TOPAZ KESSLER
18 MELTZER & CHECK, LLP

19 By: _____ /s/
20 Robin Winchester

21 Co-Lead Counsel for Plaintiffs

22 **ORDER**

23 PURSUANT TO STIPULATION, IT IS SO ORDERED,

24 Dated: 8/20/2010

25 _____
26 The Honorable Jerome F. Flagg
27 United States District Judge

1 ATTESTATION PURSUANT TO GENERAL ORDER 45
2

3 I, Mikael A. Abye, am the ECF User whose ID and password are being used to file this
4 Stipulation and [Proposed] Order. In compliance with General Order 45, X.B., I hereby attest that
5 Nate McKitterick, Christopher M. Wood, and Robin Winchester have concurred in this filing.

6
7 DATED: August 18, 2010

By: _____/s/
8 Mikael A. Abye
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